

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

JUDICIAL WATCH, INC.,

Plaintiff,

v.

NORTH CAROLINA, et al.

Defendants.

Civil Action No. 3:20-cv-211-RJC-DCK

**CONSENT MOTION TO EXTEND TIME TO RESPOND  
TO MAGISTRATE'S MEMORANDUM AND RECOMMENDATIONS**

NOW COMES Plaintiff Judicial Watch, Inc. (Judicial Watch) by and through undersigned counsel, Mark A. Jones, Esq., respectfully moving this Honorable Court, pursuant to 28 USC § 636(b)(1)(C) and Rules 6(b) and 72(b)(2) of the Federal Rules of Civil Procedure, for an extension of the time in which to file specific written objections to the proposed findings and recommendations of the U.S. Magistrate Judge's Memorandum and Recommendation (Doc. No. 61). In support, Plaintiff shows the following unto the Court.

On August 20, 2021, the U.S. Magistrate Judge filed a Memorandum and Recommendation. (Id.) The current deadline for filing specific written objections to the proposed findings and recommendations is September 3, 2021. On August 16, 2021, the U.S. Election Assistance Commission (EAC) published the biennial Election Administration and Voting Survey (EAVS) Comprehensive Report. This report is a state-by-state analysis of the data regarding multiple topics related to the administration of federal elections. Plaintiff is requesting additional fourteen (14) days to make its Rule 72(b)(2) responses so that it can review and consider the new EAVS Report and so to further continue a dialogue with the Defendants regarding the issues raised through this matter.

Plaintiff has conferred with an attorney for Defendants who give their consent to granting of this extension motion. A Proposed Order is attached.

WHEREFORE, Plaintiff's respectfully moves this Honorable Court, pursuant to Rules 6(b) and 72(b)(2) of the Federal Rules of Civil Procedure, for a fourteen (14) day extension of time to file specific written objections to the proposed findings and recommendations of the U.S. Magistrate Judge's Memorandum and Recommendation (Doc. No. 61).

Respectfully Submitted, this the 26<sup>th</sup> day of August, 2021.

/s Mark A. Jones

Mark A. Jones, Esq.

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